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A. GAITHER	3/10/08	RCO4144

Waste Industry Experts

Joyce Engineering, Inc
2211 W. Meadowview Road
Suite 101
Greensboro, NC 27407

tel: 336/323-0092

fax: 336/323-0093

www.JoyceEngineering.com

April 9, 2007

James C. Coffey
Regional Engineer
Asheville Regional Office
Solid Waste Section
North Carolina Department of Environment and Natural Resources
2090 US Highway 70
Swannanoa, North Carolina 28778

**RE: Permit to Construct Application, Response to Preliminary Comments
Transylvania County MSW Landfill
Permit No. 88-07
JEI Project No. 336.06; Task 25**

Dear Mr. Coffey

On behalf of the Transylvania County Department of Solid Waste, Joyce Engineering, Inc. is submitting this response to the *Preliminary Review Comments* for the Transylvania County Landfill dated March 19, 2007. The comments from this letter are provided below in italics, followed by our responses. This letter and the associated attachments are provided in a format that allows for incorporation into the original report binders.

Engineering Plan/CQA Plan

1. Describe proper procedures for tie in to existing liner system, include in the CQA Plan and designate responsible CQA party.

The CQA Plan on page 14 under section 3.4.3.2 "Seam Preparation" has been modified to include construction procedures and conditions for the liner tie-in area. On page 17 under section 3.4.8 "Lining System Acceptance" a clarification was added indicating that a project manager/engineer will inspect and approve existing liner conditions for the tie-in construction. ✓

2. It appears that all soil needed will be available on-site, if the borrow area is located outside of Phase 5, provide grading contours and if stockpiled, note stockpile areas.

Preliminary grading has been included for the borrow areas located outside of Phase 5. Stockpiling will occur in the first section of the borrow area and has been identified on Drawing EP-12. ✓

Operations Plan

3. Discuss storm water management procedures when moving into the rain cover area.

The Operations Plan on page 8 under section 5.1 "subcell progression" has been modified to indicate the stormwater management procedures for each section of the raincover as indicated in the stormwater segregation drawings. As each section of raincover is removed as shown in the drawings, a five foot thick layer of residential non-bulky wastes will be placed over the entire area. This initial lift will be minimally compacted and serve to both protect the liner and limit stormwater entering the drainage aggregate directly. This lift will be followed by intermediate

cover to further limit stormwater concerns. The intermediate cover will be scraped back as the working face progresses through the new section. This process will be repeated for each new section of raincover removed.

4. Will the MSWLF unit accept C&D waste, if so, the waste acceptance plan needs revision.

The Operations Plan on page 3 under section 3.3 "Waste Acceptance" has been modified to include C&D waste acceptance at the facility.

5. Prepare a monitoring and contingency plan for the underdrain system.

The underdrain system has been added to section 4 of the Water Quality Monitoring Plan as a surface monitoring point (SMP-4). A reference to this point has also been included in the Operations Plan in section 7.1 "Water Quality". The Plan has also been updated to note that if leachate is detected at this sampling point, and a resample confirms leachate contamination then the outfall will be directed to the leachate tank.

4. The LCID landfill (old permit #88-B) was previously incorporated into the MSWLF facility permit, and if the grinding operation is now inactive, please revise the Operations Plan and operation conditions as needed.

The LCID landfill remains active and the Operations Plan has been revised to incorporate additional details about the existing grinding operation. Wood waste will generally be landfilled at the LCID landfill with cover being applied at least every 30 days. However in instances where a significant amount of wood waste is accumulated in a 30 day period between covering, a grinder may be brought in to process the waste. The grinding operation is discussed in the Operations Plan in section 2.1 "existing conditions" The grinding operation location is also shown on Drawing OP-2.

In closing, on behalf of the Transylvania County Department of Solid Waste, we would like to thank you for your attention to, and assistance with, this permit application. Please feel free to call us at (336) 323-0092 if you have any additional issues that may be resolved by phone in order to expedite your review.

Sincerely,
JOYCE ENGINEERING, INC.



Evan Andrews, P.E.
Technical Consultant

Attachments: Drawings (EP-12, DH-7)
Engineering Plan (pg 2)
CQA Plan
Operations Plan
Monitoring Plan

Cc: File

